
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : AMENDED CRIMINAL COMPLAINT
v. :
DEBBIE SHANK MORGAN : Mag No. 13-8036 (MCA)

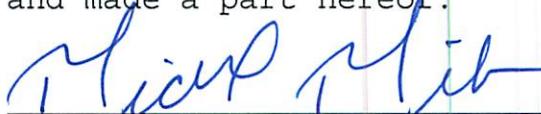
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent, and that this amended complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Michael C. Mikulka, Special Agent
Department of Labor, Office of
Inspector General, Office of
Labor Racketeering and Fraud
Investigations

Sworn to before me and subscribed in my presence,
February 6, 2013, at Newark, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

Count One

(Making and Using False and Fictitious Statements & Documents)

On or about September 13, 2012, in Union County, in the District of New Jersey and elsewhere, defendant Debbie Shank Morgan, in a matter within the jurisdiction of the executive branch of the United States, namely, the United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations, knowingly and willfully (a) made materially false, fictitious, and fraudulent statements and representations, (b) made and used false writings and documents knowing them to contain materially false, fictitious, and fraudulent statements and entries, and (c) falsified, concealed, and covered up by trick, scheme, and device, certain material facts; namely, a false and fictitious e-mail, as described in Paragraphs 14 and 15 of Attachment B below, in violation of Title 18, United States Code, Section 1001 and Title 18, United States Code, Section 2.

Count Two

(Making and Using False and Fictitious Statements & Documents)

On or about December 29, 2012, in Union County, in the District of New Jersey and elsewhere, defendant Debbie Shank Morgan, in a matter within the jurisdiction of the executive branch of the United States, namely, the United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations, knowingly and willfully (a) made materially false, fictitious, and fraudulent statements and representations, (b) made and used false writings and documents knowing them to contain materially false, fictitious, and fraudulent statements and entries, and (c) falsified, concealed, and covered up by trick, scheme, and device, certain material facts; namely, a false and fictitious e-mail, as described in Paragraphs 17 through 19 of Attachment B below, in violation of Title 18, United States Code, Section 1001 and Title 18, United States Code, Section 2.

Count Three
(Obstruction of Justice)

From in or around May 2012 through on or about February 6, 2013, in Union County, in the District of New Jersey and elsewhere, defendant Debbie Shank Morgan, knowingly altered, concealed, covered up, falsified, and made false entries in records, documents, and tangible objects with the intent to impede, obstruct, and influence an investigation and the proper administration of any matter within the jurisdiction of an agency and department of the United States, namely, the United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations, as described in Attachment B below, in violation of Title 18, United States Code, Section 1519 and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Michael C. Mikulka, am a Special Agent of the United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations. I have knowledge of the facts set forth herein through my personal participation in this investigation and through oral and written reports from other federal agents or other law enforcement officers. Where statements of others are related herein, they are related in substance and part. Since this Amended Criminal Complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. I have only set forth those facts that I believe are sufficient to show probable cause exists to believe that the defendant has committed the offenses set forth in Attachment A. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. As a Special Agent with the Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations, I am charged with investigating violations of federal law committed by officers and employees of labor unions and employee benefit plans, including bribery and embezzlement.

Introduction and Summary of the Investigation

1. At times relevant to this Amended Criminal Complaint:

a. Defendant Debbie Shank Morgan (hereinafter "Morgan"), was a resident of Euclid, Ohio. Defendant Morgan advised Your Affiant that she was a non-practicing lawyer who investigated crimes associated with labor unions, employee benefit plans, and other alleged violations of federal criminal and civil law.

b. The United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations (hereinafter "DOL-OIG") was an agency of executive branch of the United States. Your Affiant was assigned to the DOL-OIG's office in Mountainside, New Jersey. Several years ago, Your Affiant was assigned to an investigation concerning a local labor union in New Jersey (hereinafter the "New Jersey Local"). That investigation resulted in the conviction of several high-ranking union officers from that local and contractors. The New Jersey Local reported to an international labor union headquartered in Washington, D.C. (hereinafter the "International"). The investigation of the New Jersey Local and resulting prosecutions received a significant amount of press coverage in New Jersey and elsewhere.

2. Defendant Morgan reported to federal law enforcement officers in the District of New Jersey that she had information and evidence concerning the alleged embezzlement of approximately \$30 million from a political action committee by former officials of a labor organization. In addition, as described herein, defendant Morgan reported to federal law enforcement officers in the District of New Jersey that an individual had fired a weapon at her vehicle, at the direction of a union officer in Ohio. Your Affiant's investigation has revealed that defendant Morgan's accusations are false and that she has fabricated evidence, such as e-mails, text messages, and a recording, in support of her baseless and false accusations.

Morgan's False Accusations Concerning the International and Fabrication and Alteration of Evidence

3. Beginning in or around May 2012, defendant Morgan contacted the DOL-OIG in New Jersey, reporting that she had information concerning the alleged criminal activities involving current and former officers and employees of the International and associated local unions. Defendant Morgan claimed that she had a personal relationship with a former officer of the International (hereinafter the "Former Union Officer"). Defendant Morgan further claimed that the Former Union Officer and his father, also a former officer of the International (hereinafter the "Father"), were involved in serious violations of federal law. In particular, defendant Morgan reported to Your Affiant that the Former Union Officer had allegedly admitted to her that the Father had embezzled at least \$30 million from a Political Action Committee ("PAC") associated with the International. Defendant Morgan further reported that the Father transferred the alleged embezzled money to an offshore account and then evaded the payment of taxes on the embezzled funds. In addition, defendant Morgan also reported that the Former Union Officer had admitted to her that he (the Former Union Officer) had accepted things of value, such as a car and vacations, from prohibited sources, namely, companies that did business with the International and employee benefit plans or funds sponsored by or associated with the International. If these allegations were true, then such conduct by the Former Union Officer and the Father would have constituted possible violations of federal law, including but not limited to, Title 18, United States Code, Section 1343 (wire fraud) and 1954 (bribery and graft related to employee benefit plans); Title 29, United States Code, Section 186 (Taft-Hartley bribery and graft) and 501(c) (theft or embezzlement from a labor union); and Title 26, United States Code, Section 7201 (tax evasion). Based on defendant Morgan's allegations, Your Affiant initiated a federal investigation.

4. Defendant Morgan also advised Your Affiant that the Former Union Officer wanted to confess to his crimes to federal agents from the DOL-OIG, and the Father and Former Union Officer had been meeting with an accountant for the purpose of amending their tax returns. Defendant Morgan reported that they intended to report on these amended returns the millions of dollars they had allegedly concealed from the Internal Revenue Service.

5. In support of her allegations described in Paragraphs 3 and 4 above, defendant Morgan told Your Affiant that she had communicated with the Former Union Officer via text messaging, and the Former Union Officer had made numerous admissions to her in these text messages concerning his alleged criminal conduct and the Father's alleged criminal conduct. Beginning in or around late July 2012, defendant Morgan commenced transmitting a voluminous number of e-mails to Your Affiant, via my government issued e-mail account. Defendant Morgan represented that these e-mails contained the text messages between herself and the Former Union Officer. Defendant Morgan transmitted these e-mails from her America-On Line e-mail account (hereinafter the "Morgan AOL Account"). For example, on or about July 24, 2012, defendant Morgan, using the Morgan AOL Account, sent the following e-mail to Your Affiant:

[Morgan:] "do u [sic] still plan to tell it all [sic] u know kickbacks vacations everything"

[Former Union Officer:] "yes i am not doing thi[s] [sic] a 2 nd time [this a second time]"

6. Based on defendant Morgan's allegations, Your Affiant sought defendant Morgan's assistance in obtaining these text messages for use as evidence against the Former Union Officer and the Father. To that end, defendant Morgan told Your Affiant that she had used a satellite phone (hereinafter the "Satellite Phone") to send and receive the text messages to and from the Former Union Officer. Defendant Morgan also provided Your Affiant with a phone number she claimed the Former Union Officer had used to send and receive the alleged text messages (hereinafter the "Phone Number").

7. On or about December 11, 2012, defendant Morgan sent Your Affiant an e-mail from the Morgan AOL Account, confirming that the alleged text messages that she had sent and received from the Former Union Officer were transmitted via the Phone Number.

8. As part of this investigation and in response to a federal Grand Jury subpoena, Your Affiant obtained records from a phone company related to the Phone Number (hereinafter the "Phone Company"). The Phone Company reported that the Phone Number was not assigned to any subscriber, had not been in service since in or around January 1, 2012, and belonged to a hard line or "land line" and not a cellular phone. Based on my education, training, and experience, Your Affiant knows that a hard line or "land line" is technologically incapable of sending and receiving text messages, as only cellular and satellite phones have such capability. Based on the information provided by the Phone Company, defendant Morgan's claims that she had sent and received text messages to and from the Phone Number is technologically impossible.

9. On or about August 8, 2012, Your Affiant and another federal agent interviewed the Former Union Officer for approximately four hours. During this voluntary, non-custodial interview, the Former Union Officer stated that he had never met defendant Morgan, did not know who she was, and had never sent her or received from her any text messages. The Former Union Officer denied that his Father had embezzled any money or funds from the International or a PAC, and he denied engaging in the illegal activities alleged by defendant Morgan. The Former Union Officer denied being assigned or ever using the Phone Number. During the interview, Your Affiant and another federal agent showed the Former Union Officer some of the text messages, allegedly between himself and defendant Morgan, including the following:

[Morgan]: "r u back w/atty [with an attorney]"

[Union Officer]: "yeah dad [Father] is i [Union Officer] smoking

[Morgan]: "remember elton john concert in cle [Cleveland]"

[Union Officer]: "yes I had a great time. . . ."

The Former Union Officer reported that he has never smoked (and he was not observed smoking during the four hour interview, he has never attended an Elton John concert in any location.

10. On or about August 20, 2012, defendant Morgan traveled to New Jersey and met with Your Affiant and other law enforcement officers to discuss, among other things, the allegations concerning the Former Union Officer and the Father. Before this meeting, Your Affiant asked defendant Morgan to bring the Satellite Phone to Your Affiant's office when she traveled to New Jersey so it could be forensically examined to determine the credibility, or lack thereof, of defendant Morgan's or the Former Union Officer's version of events. During the meeting, on or about August 20, 2012, when asked about the Satellite Phone, defendant Morgan claimed that she forgot it at home, but she agreed to send it to the DOL-OIG at a later date. During this meeting, Your Affiant showed defendant Morgan copies of the e-mails that she had previously sent to Your Affiant (*i.e.*, the e-mails she claimed contained the text messages between her and the Union Officer), and she again acknowledged that these e-mails represented text message communications between herself and the Former Union Officer.

11. On or about September 12, 2012, defendant Morgan advised that she was sending a parcel (herein the "Parcel") containing the Satellite Phone to Your Affiant. Thereafter, Your Affiant received the Parcel, but in a damaged condition. The Parcel contained a hole approximately two inches in diameter. Inside the Parcel, Your Affiant discovered a satellite phone and a charger cable that was not compatible with the satellite phone. When Your Affiant inspected the satellite phone, I further observed that the subscriber identity module or subscriber identification module ("SIM") card was missing from the satellite phone. The SIM card is used to store identifying information for the user and may also store user data, such as text messages.

12. On or about September 12, 2012, while in New Jersey, Your Affiant consensually recorded a telephone conversations with defendant Morgan. Your Affiant advised defendant Morgan that the Parcel was damaged. Defendant Morgan claimed that the Parcel was not damaged when she had sent it to the DOL-OIG in New Jersey. Defendant Morgan further claimed that the SIM card was contained inside a small jewelry pouch inside the Parcel. After Your Affiant informed defendant Morgan that the pouch was not inside the Parcel, defendant Morgan stated, in substance and in part, that she had included the SIM card inside the Parcel before she had shipped it to the DOL-OIG in New Jersey. During this consensually recorded conversation, defendant Morgan further stated that the text messages between her and the Former Union Official were on the SIM card that was missing from the Parcel.

13. In an alleged effort to obtain the alleged data on the SIM card (i.e., the alleged text messages), defendant Morgan contacted the Satellite Phone's service provider to determine whether or not it stored the text messages and whether or not this stored data could be transferred to a new SIM card. On or about September 13, 2012, defendant Morgan, using the Morgan AOL Account, sent Your Affiant an e-mail, claiming that the satellite telephone company was located in Saudi Arabia (hereinafter the "Alleged Satellite Service Provider"). In another e-mail that day, defendant Morgan claimed that she had contacted, via e-mail, a representative of the Alleged Satellite Service Provider in Saudi Arabia. This e-mail was sent from the Morgan AOL Account to the alleged Satellite Service Provider's e-mail account (hereinafter the "Satellite Provider E-mail Account"), an e-mail account provided by Google Inc. (hereinafter "Google"). The e-mail requested a duplicate SIM card containing the alleged text messages between her and the Former Union Official. This e-mail from defendant Morgan to the Alleged Satellite Service Provider was written in Arabic. Defendant Morgan had previously advised Your Affiant that she is fluent in Arabic.

14. On or about September 13, 2012, defendant Morgan forwarded Your Affiant, while in New Jersey, another e-mail, which e-mail she claimed was a response from the Alleged Satellite Service Provider and allegedly sent from the Satellite Provider E-mail Account to the Morgan AOL Account. In this e-mail, the Alleged Satellite Service Provider purportedly claimed that the company believed it was possible to create a new SIM card containing the alleged text messages between Morgan and the Union Official. In the e-mail, the Alleged Satellite Service Provider purportedly claimed that it would take approximately ten days to complete the process. This e-mail response was also written in Arabic. To date, defendant Morgan claims that she has not received the replacement SIM card from the Alleged Satellite Service Provider.

15. As part of this investigation, Your Affiant has sought and obtained search warrants, requiring AOL and Google to provide law enforcement with certain information and e-mails associated with the Morgan AOL Account and the Satellite Provider E-mail Account. Your Affiant has reviewed the information provided by these e-mail providers. This information reveals the following:

- a. Morgan AOL Account. Contrary to the e-mail defendant Morgan forwarded to Your Affiant on or about September 13, 2012 (see Paragraph 14 above), no e-mails were received by the Morgan AOL Account

from the Satellite Provider E-mail Account, including the period in or around mid-September 2012.

- b. Satellite Provider E-mail Account. Contrary to the e-mail defendant Morgan forwarded to Your Affiant on or about September 13, 2012 (see Paragraph 14 above), no e-mails were sent from the Satellite Provider E-mail Account to the Morgan AOL Account, including the period in or around mid-September 2012. Furthermore, the Satellite Provider E-mail Account was established in 2008; however, the Internet Protocol ("IP") logs for the Satellite Provider E-mail Account during the period in or around September and October 18, 2012 show no log-in activities on the account. Based on my education, training, and experience, the lack of IP log-ins for this period is indicative of a dormant or infrequently used e-mail account.

16. As described above, defendant Morgan represented to Your Affiant and other federal agents that she had a close relationship with the Former Union Officer, and he wanted to meet with law enforcement to admit to his crimes and the Father's crimes. Thereafter, on numerous occasions, Your Affiant requested defendant Morgan to arrange an interview between federal agents and the Former Union Officer. Eventually, defendant Morgan claimed that the Former Union Officer was no longer taking her calls and had changed his mind about speaking with federal agents.

17. On or about December 29, 2012, defendant Morgan forwarded to Your Affiant what purport to be a chain of e-mails between defendant Morgan (via the Morgan AOL Account) and another former union officer from the west coast (hereinafter the "West Coast Union Officer"). Your Affiant's investigation has revealed that defendant Morgan fabricated and altered portions of these e-mails, before transmitting them to Your Affiant, to create the illusion that she knew and had a relationship with the Former Union Officer. The e-mail chain defendant Morgan sent to Your Affiant stated the following, in substance and in part:

From: Debbie Morgan [Morgan AOL Account]
Sent: Saturday, December 29, 2012 11:55 PM
To: [Your Affiant's e-mail address] [Your Affiant's supervisor's e-mail address]
Subject: Fwd: Question for you

-----Original Message-----

From: [West Coast Union Officer's e-mail address]
To: [Morgan AOL Account]
Sent: Sat, Dec 29, 2012 11:49 pm
Subject: RE: Question for you

Well, as far as the weather it's cold here, we don't have snow and at this time a nice fire in the fire place.

[The Former Union Officer] is very knowledgeable about [another officer from the International] and anything to do with the International Union and yes, the number I gave you is his direct line and goes to his cellphone.

[West Coast Union Officer]

* * * *

-----Original Message-----

From: [West Coast Union Officer]
To: [Morgan AOL Account]
Sent: Sat, Dec 29, 2012 11:15 pm
Subject: Re: Question for you

I think so. Like you said before . . . you might want to schedule a meeting with him for lunch or something off site. I believe in my heart he will be honest and tell you what you need to know. I know you two had problems. He told me. If you would like I could call him before you do. He wants to talk to you. Call him. I hope you have a happy new year. (emphasis added).

[West Coast Union Officer]

Sent from my iPad

18. The results from the AOL search warrant reveal the actual contents of the e-mail sent Saturday, December 29, 2012 11:15 pm:

From: [West Coast Union Officer]
To: [Morgan AOL Account]
Sent: Sat, Dec 29, 2012 11:15 pm
Subject: Re: Question for you

I think so. Like you said before . . . you might want to schedule a meeting with him for lunch or something off site. Worse [sic] case scenario you might have to subpoena him but I believe in my heart he will be honest and tell you what you need to know. If you would like I could [contact] him before you do and talk to him if that will help.

I hope you have a happy new year.

[West Coast Union Officer]

Sent from my iPad

19. The bolded and underlined portions of the e-mails described in Paragraphs 17 and 18 above represent information that defendant Morgan had deleted or added to the e-mail chain before she transmitted the e-mails to Your Affiant on or about December 29, 2012, as demonstrated based on the information provided by AOL in accordance with the search warrant.

The Alleged Shooting of Defendant Morgan

20. On or about September 9, 2012, defendant Morgan called Your Affiant, while I was physically present in New Jersey, on my government-issued cell phone. During this phone conversation (not recorded), defendant Morgan stated that, while driving in Ohio, an unknown person allegedly fired a gun and a round had struck her passenger-side mirror. Defendant Morgan further stated that she believed the shooting was related to her investigation of various local unions affiliated with the International. When Your Affiant asked her if she had filed a police report, she stated that she had not. Based on her claim that someone had fired a weapon at her, Your Affiant recommended that she file a police report with the department having jurisdiction in the location where the alleged shooting took place.

21. As part of this investigation, Your Affiant obtained documents, including the police report, from a police department in Lake County, Ohio (hereinafter the "Police Report"). According to a Call for Service Report, defendant Morgan arrived in the lobby to file a police report and reported that "someone shot her side mirror." This Call for Service report was classified as property damage. According to the Police Report, defendant Morgan reported the following incident occurring on or about September 7, 2012, between 4:00 p.m. and 5:00 p.m.: "Morgan was traveling n/b [north bound] . . . [in her vehicle and] heard a popping noise from her left. Morgan looked and observed the passenger side mirror glass to have a hole. The mirror then fell out of the mirror housing and scratched the passenger side door of her car as it broke apart." The Police Report also noted that officer observed the scratch marks on the passenger door and did not observe any marks or other damage to mirror housing. The report is classified as property damage and is devoid of any reference to a shooter, bullets, weapons, or a shooting. If defendant Morgan's version of the event is true, then it means that the round struck her car's mirror, broke the thin mirror, but neither penetrated nor damaged the mirror's housing.

22. On or about January 27, 2013, Your Affiant received an e-mail from defendant Morgan, wherein she attempted to explain the lack of key details in the Police Report. In this e-mail, defendant Morgan described the officer who took the report as "Barney Fife" and stated he "was attempting to convince me that a rock had flown and hit my mirror. Although I knew that was not the case, based on the crackle and mini sonic boom of sorts [sic] that I heard not once but twice before my mirror exploded, as I told you, I did not really want to answer the questions about what might've [sic] caused this to occur. I also did not believe and I don't think you did either that the shooter whatever [would ever] be found. So it seemed like a waste of time, at that time, to be more dogmatic about the events of that day or what I was doing that probably led to this happening." Before defendant Morgan filed the report, Your Affiant urged her to report all the circumstances of the alleged shooting incident.

23. On or about October 9, 2012, Your Affiant and another federal agent, while in New Jersey, spoke with defendant Morgan over the telephone. During this consensually recorded call, defendant Morgan stated that on or about **September 28, 2012** she had received a telephone call from a blocked phone number. The caller identified herself as the wife of the man who allegedly shot at defendant Morgan's vehicle (hereinafter the "Shooter's Wife"). Defendant Morgan further advised that the Shooter's Wife admitted that her husband (hereinafter the

"Alleged Shooter") shot at defendant Morgan, and the Alleged Shooter did so at the direction of a union officer from a local union in Ohio (hereinafter the "Ohio Union Officer"). Defendant Morgan stated that she did not record this conversation with the Shooter's Wife.

24. On November 27, 2012, Your Affiant and another federal agent spoke with defendant Morgan over the telephone. During the phone call, defendant Morgan provided the name of the Alleged Shooter. Contrary to her prior statement, as described in Paragraph 23 above, defendant Morgan stated, for the first time, that she had secretly recorded the telephone call between herself and the Shooter's Wife (hereinafter the "Recording"). Defendant Morgan also stated that the Shooter's Wife's daughter had leukemia.

25. On or about January 13, 2013, Your Affiant called defendant Morgan. During this consensually recorded conversation, defendant Morgan played the Recording over the telephone, which conversation defendant Morgan represented was a secretly recorded phone conversation between herself and the Shooter's Wife.

26. On or about January 18, 2013, federal agents from the DOL-OIG visited defendant Morgan in Ohio and obtained from her two USB thumb drives that she stated contained the Recording. On or about January 22, 2013, Your Affiant and another federal agent spoke with defendant Morgan over the telephone. During this consensually recorded call, defendant Morgan stated that the USB thumb drives that she had provided to federal agents on January 18, 2013 were the only original recordings of the phone call she recorded between herself and the Alleged Wife. Defendant Morgan stated, for the first time, that the call occurred between herself and the Alleged Wife on October 10, 2012.

27. The metadata (i.e., the data associated with an electronic file that contains information, such as creation, modification, and access dates and times, concerning the file itself) from these devices reveal that the Recording was created on or about October 10, 2012. This data directly contradicts defendant Morgan's prior statement made on October 9, 2012 to Your Affiant, wherein defendant Morgan stated that she had spoken to the Shooter's Wife on September 28, 2012.

28. On or about January 15, 2013, Your Affiant and another federal agent interviewed the Shooter's Wife. The Shooter's Wife advised that she is divorced from the Alleged Shooter. When

questioned, the Shooter's Wife reported that she did not know defendant Morgan, never called defendant Morgan on the telephone, never told defendant Morgan that her husband (i.e., her ex-husband) had fired at defendant Morgan. The Shooter's Wife further advised that her daughter has never had a serious illness, including leukemia. Finally, Your Affiant played a portion of the Recording to the Shooter's Wife. The Shooter's Wife reported that the voice on the Recording was not her voice. During this interview, Your Affiant became familiar with her voice and speaking style, and Your Affiant submits that the second female voice on the Recording does not belong to the Shooter's Wife. On the same date, Your Affiant and another federal agent also interviewed the Alleged Shooter. During this interview, the Alleged Shooter stated that he has never fired a firearm at anyone, was never directed by anyone, including the Ohio Union Officer, to fire a weapon at any person, and his daughter does not have a serious illness. During the interview, the Alleged Shooter expressed concern and anger that he would be arrested by the local police based on defendant Morgan's allegations, which allegations he expressly rejected as false.

29. Your Affiant has listened to the Recording. Based on my experience with making and listening to consensually monitored phone calls, the Recording does not sound as if it were made over a telephone. The voices are extremely clear and a distinct echo is audible on the Recording, sounding as if the parties were located in the same room while making the Recording. Moreover, in Your Affiant's opinion, the conversation contained on the Recording sounds as if were staged and the participants (defendant Morgan and an unknown female) were reading from a script.